

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO. 2:25-cv-00602-JHC

DECLARATION OF CARLA REYES

I, CARLA REYES, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am the Assistant Secretary for Economic Services Administration at the Washington State Department of Social and Health Services (DSHS). I have held this position since February 2025. In this role, I oversee our Policy and Operations of the Community Services Division (CSD) staff who provide voter registration assistance to customers they serve. I am familiar with the policy and procedures that govern manual and automatic voter registration assistance processes within the CSD.

1 3. Washington Department of Social and Health Services is a designated Voter
2 Registration Assistance Agency through the National Voter Registration Act of 1993. DSHS has
3 also provided the opportunity for Automatic Voter Registration since 2018 for customers who
4 have provided proof of their U.S. Citizenship as part of their request for assistance.

5 4. I am submitting this declaration in support of the Plaintiffs' Motion for Partial
6 Summary Judgment filed in response to Executive Order No. 14248, "Preserving and Protecting
7 the Integrity of American Elections." I understand that Section 2(a) requires the Election
8 Assistance Commission (EAC) to change the national mail voter registration form (Federal
9 Form) to require documentary proof of United States citizenship.

10 5. I understand that the National Voter Registration Act requires state voter
11 registration agencies to provide clients with the Federal Form or "the office's own form that is
12 equivalent to" the Federal Form. I further understand that the Ninth Circuit Court of Appeals has
13 interpreted this to mean that the agency form must be "virtually identical" to the Federal Form.

14 6. CSD offers customers a meaningful opportunity to register to vote or update their
15 voter registration at every application for benefits, benefit eligibility review, recertification and
16 change of address.

17 7. CSD administers federal and state public assistance programs such as Temporary
18 Assistance for Needy Families and the Supplemental Nutrition Assistance Program. In the State
19 Fiscal Year 2024, for instance, CSD processed 840,178 applications for benefits, and approved
20 391,725 recertifications for food, cash and medical assistance. These 1,231,906 case actions
21 provided opportunity to receive voter registration assistance.

22 8. Within CSD there are several opportunities for financial and social workers to
23 assist customers with voter registration.

24 9. Customers who access the Washington Connection online portal are asked if they
25 would like to register to vote. If they respond affirmatively, they are provided with a link to the
26 Secretary of State website.

1 10. CSD staff conducting in-person interviews follow prompts within Barcode,
2 CSD's system for maintaining customer records, to ask if a customer would like assistance
3 with voter registration. If they answer in the affirmative, they are provided a copy of the
4 Secretary of State voter registration form. They may complete the form during the interview
5 and give it to the CSD staff person to transmit on their behalf to the Secretary of State. The
6 Secretary of State processes the voter registration activities.

7 11. CSD staff conducting telephonic interviews follow prompts within the Barcode
8 system to ask if a customer would like assistance with voter registration. If they answer in the
9 affirmative, a copy of the Secretary of State voter registration form is mailed to them via U.S.
10 mail. The customer may complete the form and send it back to the Secretary of State for
11 processing.

12 12. When a customer submits an Application for Medicare Savings Programs,
13 Application for Cash or Food Assistance, Eligibility Review, Washington State Combined
14 Application Program (WASHCAP) application, Washington Apple Health Application for
15 Aged, Blind, Disabled/Long-Term Care Coverage or a Washington Apple Health Application
16 for Tailored Supports for Older Adults (TSOA), Barcode will check coding in the Automated
17 Client Eligibility System (ACES) to identify customers who are coded as at least 18 years of
18 age, verified as U.S. citizens and legal residents of Washington state. When all three elements
19 are present, data including the name, residential and mailing addresses, date of birth, image of
20 the signature, U.S. Citizenship and Washington Residency data fields are transmitted to the
21 Secretary of State electronically. The Secretary of State uses this data to process voter
22 registration activities.

23 13. CSD can send a voter registration form by U.S. mail upon request.

24 14. If the voter registration form is changed, DSHS will need to submit a change
25 request to replace the forms currently housed in ACES and Barcode so that the proper form
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1 would be provided to the customer. If the new voter registration form meets DSHS formatting
2 and layout requirements, we anticipate ACES and Barcode changes could take nine to twelve
3 months to promote after policy and procedures are finalized.

4 15. If CSD staff are required to assist all customers who elect to complete voter
5 registration activities, including obtaining documentary evidence of citizenship, there will be
6 impacts on staff workload, staff policies, procedures, forms, and Barcode system workflow
7 prompts. We estimate that it may take an additional 5 minutes to complete this process for each
8 transaction for which a customer wants assistance to register to vote. If we processed 1,231,906
9 application and redetermination actions that could equate to 89.5 full time equivalent positions
10 and \$10.9 million in additional costs. Further, this change means we may need to discontinue
11 the automatic voter registration process currently in place.

12 16. It is likely that the documentary evidence required for voter registration will not
13 align with the citizenship verification processes currently in place to determine eligibility for
14 public assistance benefits. Since the customer is unlikely to have the documentary evidence with
15 them at the point of interview, we would be unable to help them complete voter registration
16 activities at that time. They would either have to schedule a return interview time or follow up
17 directly with the Secretary of State. Since this process does not currently exist, we estimate the
18 work to accomplish this would be equivalent to processing a change of circumstance. It takes 27
19 minutes to process a change of circumstance. If we were to have a 10% follow-up rate based on
20 the number of actions processed, that would equate to 48.3 full-time equivalent positions and
21 \$5.9 million in additional costs.

22 17. These changes would also require revision of our manuals, training materials,
23 online training systems, voter registration information, links, etc. The time to train 1,925 staff
24 would equate to \$239,000 in additional costs.
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1 18. Since the documentary evidence would need to be transmitted to Secretary of
2 State, we would need to invest in technology infrastructure to securely transmit the documents
3 to the Secretary of State.

4 19. The above estimates are necessarily uncertain. The specific details in the
5 implementation regulations are currently unknown, inhibiting the ability to create design-
6 specific changes to these processes and online tools. Nonetheless, when documentary proof of
7 citizenship is required on the Federal Form, it is certain that there will be expenses associated
8 with implementing those changes, whether those expenses are borne by the Secretary of State or
9 DSHS.

10 20. In sum, changing the voter registration process to align to new federal
11 requirements will be time-consuming and costly.

12 21. This information relates only to the Economic Services Administration of the
13 DSHS. Other DSHS administrations also offer voter registration assistance services.

14 I declare under penalty of perjury under the laws of the State of Washington and the
15 United States of America that the foregoing is true and correct.

16 DATED this 20 day of May 2025.

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19 CARLA REYES
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